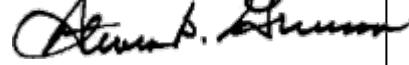


EXHIBIT A

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1 COM

2 GEORGE T. BOCHANIS, ESQ.

3 Nevada Bar No.: 2262

4 **GEORGE T. BOCHANIS, LTD.**

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9 CASE NO: A-21-837480-C

10 Department 6

11 *Attorneys for Plaintiff*12 **DISTRICT COURT**13 **CLARK COUNTY, NEVADA**

14 DARRELLYNE MAY SINOHUI, an individual.

15 Plaintiff,

16 v.

17 Case No.:

18 ATS SPECIALIZED, INC., a foreign corporation;
19 KEVIN EDWARD BASLER, individually; DOES
20 I through X; and ROE CORPORATIONS XI
through XX, inclusive,

21 Dept. No.:

22 Defendants.

23 **COMPLAINT**24 Plaintiff, DARRELLYNE MAY SINOHUI, by and through her attorney, GEORGE T.
BOCHANIS, ESQ., of the Law Offices of GEORGE T. BOCHANIS, LTD., complains and
alleges as follows:25 **FIRST CAUSE OF ACTION**

26 I.

27 That Plaintiff DARRELLYNE MAY SINOHUI was a resident of Henderson, Clark
County, Nevada, at all times mentioned herein

II.

That Defendant, KEVIN EDWARD BASLER, was a resident of Eldorado, Wisconsin, at
all times alleged herein.

III.

That the identities of DOES I through X, who were involved in the operation, driving, maintenance and/or inspection of the subject vehicle driven by Defendant BASLER or who were involved in the hiring, training, retention and/or supervision of said Defendant, are unknown at this time and this Complaint shall be amended to include such individuals as Defendants once their identity is ascertained.

IV.

That Defendant, ATS SPECIALIZED, INC, is a foreign corporation that had its semi tractor-trailer truck driving on the streets and highways of Clark County, Nevada at all times alleged herein.

V.

This Court has jurisdiction over this case under NRS 4.370(1) and NRS 14.065 as the matter in controversy exceeds \$15,000.00, exclusive of attorney's fees, interest and costs and the facts alleged occurred in Clark County, Nevada. Venue is proper under NRS 13.040 as this action may be tried in any county which Plaintiff may designate in the complaint.

VI.

That the true names and capacities of Defendants named herein as DOES I through X, inclusive, and ROE CORPORATIONS XI through XX, inclusive, are unknown to Plaintiffs, who therefore sue said Defendants by such fictitious names. Plaintiffs are informed and believe and thereon allege that each of the Defendants designated herein as a DOE and/or ROE is responsible for the subject motor vehicle collision referred to herein and caused damages proximately to Plaintiffs as alleged herein. Plaintiffs will ask leave of Court to amend the Complaint to insert the true names and capacities of DOES I through X, inclusive, and ROE CORPORATIONS XI through XX, inclusive, when the same have been ascertained, and to join other such Defendants in this action.

VII.

That at all times alleged herein, Defendant ATS SPECIALIZED, INC was the registered owner of a motor vehicle involved in the subject collision, described as a 2020 Freightliner semi-tractor trailer truck, bearing Minnesota license plate number PAR4413.

VIII.

That on or about August 7, 2019, Defendant KEVIN EDWARD BASLER was operating and driving said motor vehicle of which Defendant ATS SPECIALIZED, INC was the registered owner, in Clark County, Nevada.

IX.

That on or about August 7, 2019, Defendant KEVIN EDWARD BASLER, was acting and conducting himself as an employee, agent, manager, representative and/or permissive driver of Defendant ATS SPECIALIZED, INC.

x.

That on or about August 7, 2019, Defendants, and each of them, negligently and carelessly managed, maintained and entrusted said vehicle by allowing its operation by Defendant KEVIN EDWARD BASLER, and by striking and colliding into the side of a vehicle operated by Plaintiff, as a result of him making an unsafe lane change, which violated Nevada's Rules of the Road under NRS 484B.223, which caused her damages as set forth herein.

XI.

That as a direct and proximate result of the aforesaid negligence of Defendants, and each of them, Plaintiff has suffered personal injuries receiving both internal and external injuries and great pain, suffering, shock and anxiety and were required to incur expenses to employ the services of a physician and to procure x-rays, medicine and general medical care and attention. That as a result of the aforesaid actions, Plaintiffs have suffered damages in a sum in excess of \$15,000.00.

1 XII.

2 That as a further direct and proximate result of the aforesaid negligence of Defendants,
3 and each of them, Plaintiffs have incurred lost income, loss of earning capacity and other
4 incidental damages in a sum to be determined at the time of trial.
5

6 **SECOND CAUSE OF ACTION**

7 XIII.

8 Plaintiff realleges and repleads each and every allegation contained elsewhere in this
9 Compliant as though fully set forth within this Cause of Action.
10

11 XIV.

12 Defendants, and each of them, were negligent in failing to properly hire, train, retain and
13 supervise their employees, agents and representatives who caused and/or who were involved in
14 the motor vehicle collision described in this Complaint.
15

16 XV.

17 That as a direct and proximate cause of the negligent hiring, training, supervision and
18 retention by Defendants, and each of them, said Defendants have acted with wanton disregard
19 and deliberate indifference to the safety of motorists driving on the streets and highways of our
20 community and are guilty of malice, express and implied, which entitles Plaintiff to an award of
21 punitive and exemplary damages in a sum in excess of \$15,000.00.
22

23 WHEREFORE, Plaintiff, DARRELLYNE MAY SINOHUI, prays for judgment against
24 Defendants, and each of them, as follows:
25

26

- 27 1. For general and special damages in a sum in excess of \$15,000.00;
2. For punitive and exemplary damages in a sum in excess f \$15,000.00;
3. For attorney's fees as provided by Nevada Revised Statutes;
4. For legal pre-judgment interest at the highest rate allowable;
5. For costs of suit herein; and

1 6. For such other and further relief as this Court may deem just and proper under the
2 circumstances.

3 DATED: July 7, 2021
4

5 **GEORGE T. BOCHANIS, LTD.**

6
7 _____
8 /s/ George T. Bochanis, Esq.
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